

# EXHIBIT D

UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO

In re Commonwealth of Puerto Rico, et al.	)	Case No. 3:17-BK-3283 (LTS)
Debtor	)	
	)	Chapter PROMESA Title III
	)	Re: 3:17-BK-4780 (LTS)
Sciemus Limited, et al.	)	
Plaintiffs	)	
	)	
v.	)	Adv. Proc. No. 3:19-AP-369-LTS
	)	
Puerto Rico Electric Power Authority, et al.	)	
Defendants	)	

**DECLARATION OF [NAME] ON BEHALF OF AND AS  
CORPORATE REPRESENTATIVE OF FULCRO INSURANCE, INC.**

I, Ramon A. Perez Blanco, declare as follows pursuant to 28 U.S.C. § 1746:

1) My name is Ramon A. Perez Blanco. I am over the age 21 years, and I am fully competent to make this Declaration. I am President at Fulcro Insurance, Inc. ("Fulcro").

2) I am giving this Declaration on personal knowledge and as a corporate representative of Fulcro, with full authority to make this declaration on behalf of Fulcro.

3) I, on behalf of Fulcro, have reviewed the records that are the subject of this Declaration and/or have spoken to all current employees of Fulcro with knowledge of the records. This Declaration is made based upon information known or reasonably available to Fulcro.

*R.A.B.*  
4) Fulcro provided insurance brokerage services to Puerto Rico Electric Power Authority ("PREPA") for the May 15, 2014 to May 15, 2015 policy year regarding the coverage issued to PREPA by Plaintiffs (the "Policy").

5) Fulcro has agreed to search its records for documents described in the following insurance Policy language:

22. ADDITIONAL NAMED ASSURED, LOSS PAYEES AND MORTGAGEES

All third parties having a direct interest in property insured hereunder as on file with Fulcro Insurance, Inc. and/or Willis, shall automatically be Additional Named Assureds hereunder.

All other third parties including, but not limited to, loss payees and mortgagees who have an interest in property insured hereunder as on file with Fulcro Insurance, Inc. and/or Willis shall be automatically named as loss payees, and loss if any under this Policy shall be adjusted and payable in accordance with General Condition 3. and payable to the above loss payees as their interests may appear.

Permission is granted to Fulcro Insurance, Inc. to issue Certificates of Insurance and/or Evidence of Insurance naming Additional Named Insureds, loss payees and mortgagees. Such Certificates and/or Evidences may contain waivers or rights of subrogation.

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6) After a diligent and thorough search, done as if Fulcro had been properly served with a subpoena, and consistent with the legal responsibilities attendant to receipt of such subpoena, Fulcro is in possession of no responsive documents, and states that no such records of any entities with a direct interest in PREPA's insured property exist "on file" with Fulcro; Fulcro issued no Certificates of Insurance or Evidence of Insurance for the Policy; and Fulcro is aware of no entities who are loss payees, mortgagees, or additional insureds except those identified in the Policy, which are limited to PREPA Networks, LLC, PREPA Net International Wholesale Transport, Inc., Commonwealth of Puerto Rico, and Secretary of the Treasury, c/o Public Insurance Bureau.

Q.A.B. 7) Fulcro has consulted with all current employees of Fulcro who might have knowledge regarding matters stated in this Declaration.

Pursuant to 28 U.S.C. § 1746, I further declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on this 18 day of May 2020.

A handwritten signature in blue ink, appearing to read 'Ramon A. Perez Blanco', with a long horizontal stroke extending to the right.

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Ramon A. Perez Blanco, on behalf of and as  
corporate representative of Fulcro Insurance, Inc.

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO**

<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>THE COMMONWEALTH OF PUERTO RICO, et al.,</p> <p>Debtors.</p>	<p>PROMESA Title III</p> <p>Case No. 17-BK-3283-LTS (Jointly Administered)</p>
<p>In re:</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY,</p> <p>Debtor.</p>	<p>Case No. 17-BK-4780-LTS</p> <p>This Court Filing Relates Only to PREPA and Shall Only Be Filed in PREPA's Title III Case (Case No. 17-BK-4780-LTS)</p>
<p>SCIEMUS LIMITED; MARKEL EUROPE; LLOYD'S SYNDICATES MSP 318, WRB 1967, AND AGM 2488 SUBSCRIBING TO POLICY NO. B0804Q11263F14; LLOYD'S SYNDICATES MIT 3210, KLN 510, MMX 2010, CSL 1084, TMK 1880, AML 2001, AND BRT 2987 SUBSCRIBING TO POLICY NO. B080414390F14; INDIAN HARBOR INSURANCE COMPANY; PARTNERRE IRELAND INSURANCE DAC; and SWISS NATIONAL INSURANCE CO. LTD.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO,</p> <p>as representative of</p> <p>PUERTO RICO ELECTRIC POWER AUTHORITY, PREPA NETWORKS, LLC, PREPA NET INTERNATIONAL WHOLESALE TRANSPORT, INC., COMMONWEALTH OF PUERTO RICO, and</p>	<p>Adv. Pro. No. 3:19-AP-369-LTS</p> <p>DECLARATORY JUDGMENT ACTION</p>

SECRETARY OF THE TREASURY, c/o Public  
Insurance Bureau,

Defendants.

**DECLARATION OF RAMON A. PEREZ BLANCO ON BEHALF OF AND AS  
CORPORATE REPRESENTATIVE OF FULCRO INSURANCE, INC.**

TERRITORY OF PUERTO RICO

I, Ramon A. Perez, declare as follows pursuant to 28 U.S.C. § 1746:

1) My name is Ramon A. Perez Blanco. I am over the age of 21 years, and I am fully competent to make this Declaration. I am the President at Fulcro Insurance, Inc. (“Fulcro”).

2) I am giving this Declaration on personal knowledge and as a corporate representative of Fulcro, with full authority to make this Declaration on behalf of Fulcro.

3) I, on behalf of Fulcro, have reviewed the records that are the subject of this Declaration and/or have spoken to all current employees of Fulcro with knowledge of the records. This Declaration is made based upon information known or reasonably available to Fulcro.

4) Fulcro provided insurance brokerage services to Puerto Rico Electric Power Authority (“PREPA”) for the May 15, 2015 to May 15, 2016 policy year regarding the coverage issued to PREPA by Plaintiffs (the “Policy”).

5) Fulcro has agreed to search its records for documents described in the following insurance Policy language:

22. **ADDITIONAL NAMED ASSURED, LOSS PAYEES AND MORTGAGEES**

All third parties having a direct interest in property insured hereunder as on file with Fulcro Insurance, Inc. and/or Willis, shall automatically be Additional Named Assureds hereunder.

All other third parties including, but not limited to, loss payees and mortgagees who have an interest in property insured hereunder as on file with Fulcro Insurance, Inc. and/or Willis shall be automatically named as loss payees, and loss if any under this Policy shall be adjusted and payable in accordance with

General Condition 3. and payable to the above loss payees as their interests may appear.

Permission is granted to Fulcro Insurance, Inc. to issue Certificates of Insurance and/or Evidence of Insurance naming Additional Named Insureds, loss payees and mortgagees. Such Certificates and/or Evidences may contain waivers or rights of subrogation.


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6) After a diligent and thorough search, done as if Fulcro had been properly served with a subpoena, and consistent with the legal responsibilities attendant to receipt of such subpoena, Fulcro is in possession of no responsive documents, and states that no such records of any entities with a direct interest in PREPA's insured property exist "on file" with Fulcro; Fulcro issued no Certificates of Insurance or Evidence of Insurance for the Policy; and Fulcro is aware of no entities who are loss payees, mortgagees, or additional insureds except those identified in the Policy, which are limited to PREPA Networks, LLC, PREPA Net International Wholesale Transport, Inc., Commonwealth of Puerto Rico, and Secretary of the Treasury, c/o Public Insurance Bureau.

7) Fulcro has consulted with all current employees of Fulcro who might have knowledge regarding matters stated in this Declaration.

Pursuant to 28 U.S.C. § 1746, I further declare under penalty of perjury of the laws of the United States of America that the foregoing is true and correct.

Executed on this 21st day of July, 2020.

  
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Ramon A. Perez Blanco, on behalf of and as  
corporate representative of Fulcro Insurance, Inc.